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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MERIDIAN OHC PARTNERS, LP,

Plaintiff,

v.

CYANOTECH CORPORATION, a Nevada
corporation; MICHAEL A. DAVIS, an
individual; and RUDOLF STEINER
FOUNDATION, INC. d/b/a RSF SOCIAL
FINANCE, a New York corporation,

Defendants.

CASE NO.: 2:16-cv-01161-JAD-CWH

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO SUBMIT
RESPONSES AND REPLIES
RELATING TO DEFENDANTS'
MOTIONS TO DISMISS
PLAINTIFF'S VERIFIED FIRST
AMENDED COMPLAINT**

(First Request)

Pursuant to LR IA 6-1 and LR IA 6-2, Plaintiff Meridian OHC Partners, LP ("Meridian"), and Defendants Cyanotech Corporation ("Cyanotech"), Michael A. Davis ("Davis") and Rudolf Steiner Foundation, Inc. ("RSF") (and collectively, "Defendants"), hereby stipulate to extend the deadline for Meridian to respond to each of the following Motions to Dismiss filed by the Defendants on November 4, 2016: (1) Cyanotech's Motion to Dismiss Plaintiff's Derivative Claims (Dkt. No. 50); (2) RSF's Motion to

Dismiss the Complaint (Dkt. No. 53); and (3) Davis's Motion to Dismiss Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) (Dkt. 52) (collectively the "Motions to Dismiss"). This is the first request for an extension of time for Meridian to file responsive briefs.

The current deadline for Meridian to file responsive briefs to the Motions to Dismiss is November 21, 2016. Meridian and the Defendants have stipulated to an eighteen (18) day extension for Meridian to file responsive briefs to the Motions to Dismiss, such that the deadline for filing responsive briefs will be December 9, 2016. The Parties further stipulate and agree that Defendants' reply briefs in support of the Motions to Dismiss will be due December 22, 2016.

Meridian has requested additional time to file its response briefs, given that the Motions to Dismiss raise complex issues and overlapping and intertwined arguments, including joinders filed by one or more Defendants, which require material review and may require Meridian to prepare three separate responsive briefs. Thus, Meridian respectfully suggests that an eighteen (18) day extension is reasonable and that a good faith position exists for this Court to grant the stipulation of the parties.

Dated this 11th day of November, 2016.

Dated this 11th day of November, 2016.

/s/ James D. Boyle

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*Attorneys for Defendant Rudolf Steiner
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1 Dated this 11th day of November, 2016.

Dated this 11th day of November, 2016.

2 /s/ Dennis L. Kennedy

/s/ Alex L. Fugazzi

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11 *Attorneys for Defendant*
12 *Cyanotech Corporation*

Attorneys for Defendant Michael A. Davis

13
14 **ORDER**

15 Having reviewed and considered the stipulation of the parties set forth above, and
16 good cause appearing, it is hereby ORDERED that Plaintiff Meridian OHC Partners, LP
17 shall have by and through December 9, 2016 to file responsive briefs to each of the
18 above-referenced Motions to Dismiss and joinders thereto, and Defendants have until
19 December 22, 2016 to file reply briefs in response thereto.

20 IT IS SO ORDERED.

21 
22 _____
23 UNITED STATES DISTRICT JUDGE/
24 ~~UNITED STATES MAGISTRATE JUDGE~~

25 DATED: 11/14/2016
26 _____
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